

1 **TORRES | TORRES STALLINGS**

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10 Attorney for:

11 HEATHER STANLEY

12 **IN THE UNITED STATES DISTRICT COURT**

13 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

14

15 UNITED STATES OF AMERICA,

16) Case No.: 1:20-cr-00045 NONE-SKO

17)

18) Plaintiff,) **STIPULATION AND ORDER TO**
19)) **ALLOW DEFENDANT TO TRAVEL**

20) vs.)

21 HEATHER STANLEY,

22)

23) Defendant)

24)

25)
15 TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, HONORABLE DALE A.

16 DROZD AND VINCENTE A. TENNERELLI, ASSISTANT UNITED STATES ATTORNEY:

17 **COMES NOW** Defendant, HEATHER STANLEY, by and through her attorney of
18 record, DAVID A. TORRES hereby requests she be allowed to travel out of the Southern
19 District of California, where Mrs. Stanley currently resides. Mrs. Stanley is requesting to travel
20 both Washington, D.C. and Arlington, Virginia. personal and medical reasons. She will be
21 traveling via air. Mrs. Stanley has purchased prepaid airline tickets for the following dates:

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- October 18, 2021, Depart San Diego, CA at 8:30 a.m. and arrive in Washington,
D.C. at 4:42 p.m.
- October 29, 2021, Depart Washington, D.C. at 5:55 p.m. and arrive in San Diego,
CA at 8:19 p.m.

1 On or about February 26, 2021, Mrs. Stanley was ordered released on numerous pretrial
2 conditions. As a term of her release, she was ordered not to travel out of the Eastern District.
3 However, due to health reasons. Mrs. Stanley currently resides in San Diego, CA where she is
4 under the supervision of United States Pretrial Services Officer Russell Parris. Mrs. Stanley is
5 requesting to travel to Washington D.C. and Arlington, Virginia to assist her sister in taking care
6 of her child. Her sister, Kimberly Christiansen Heneghan, and her husband John Heneghan,
7 reside at 1608 North Randolph Street, Arlington, VA 22207. Mrs. Heneghan's contact number is
8 (703) 217-1096.

9 Most importantly, Mrs. Stanley plans on scheduling treatment for subglottic stenosis at
10 the Complex Airway Clinic at Johns Hopkins. This year, Ms. Stanley has undergone two trachea
11 surgeries in the past four months. Her PTS Officer, Mr. Parris is aware of her efforts to receive
12 treatment at Johns Hopkins.

13 As such, Mrs. Stanley will provide her PTS Officer Russell Parris an itinerary outlining
14 her travel plans to and from Washington D.C. and Arlington, Virginia. To date, she has complied
15 with her conditions of releases and has not violated any PTS conditions set by the court.

16 **IT IS SO STIPULATED.**

17
18 DATED: October 4, 2021

Respectfully Submitted,

/s/ David A. Torres

DAVID A. TORRES
Attorney for Defendant
HEATHER STANLEY

21 DATED: October 4, 2021

/s/ Vincente A. Tennerelli
VINCENTE A. TENNERELLI
Assistant U.S. Attorney

ORDER

IT IS SO ORDERED that defendant be allowed to travel to Washington D.C. and Arlington, Virginia on October 18, 2021, and return October 29, 2021. Moreover, Ms. Stanley is to provide her Pre-Trial Services Officer, Russell Parris, a comprehensive itinerary outlining her travel plans.

IT IS SO ORDERED.

Dated: October 4, 2021

Frank A. Bae

UNITED STATES MAGISTRATE JUDGE